



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

February 15, 2022

APPLICATION GRANTED

SO ORDERED *Nic Bla*

VERNON S. BRODERICK

U.S.D.J. 02/15/2022

BY ECF

The Honorable Vernon S. Broderick
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007

The time between February 15, 2022 and April 15, 2022 is hereby excluded under the Speedy Trial Act, 18 U.S.C. 3161(h)(7)(A), in the interest of justice. A video conference will be held on April 15, 2022 at 2 p.m.

Re: *United States v. Luis Lluberes et al., 20 Cr. 493 (VSB)*

Dear Judge Broderick:

The Government respectfully writes to request an exclusion of time in the interests of justice from Speedy Trial Act calculations. On November 2, 2021, the Court excluded time from Speedy Trial Act calculations until December 1, 2021. (Dkt. No. 112.) On November 30 and December 1, 2021, three of the defendants filed pretrial motions, *see* dkt. nos. 116-121, which had the effect of tolling speedy trial time. *See* 18 U.S.C. § 3161(h)(1)(D). A conference or hearing date has not yet been scheduled. Accordingly, out of an abundance of caution, and so the Court has sufficient time to review the pretrial motion briefing, the Government requests that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until a control date set by the Court. None of the defendants has voiced an objection to the Government's request and counsel for Maria Aguilar, a/k/a "Maria Hewitt" and Maria Lopez have consented.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By:/s/

Nicholas W. Chiuchiolo
Daniel G. Nessim
Assistant United States Attorneys
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cc: all counsel of record (by ECF)